

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**MWK RECRUITING, INC,**

Plaintiff

v.

**EVAN P. JOWERS, YULIYA  
VINOKUROVA, LEGIS  
VENTURES (HK) COMPANY  
LIMITED, AND ALEJANDRO  
VARGAS,**

Defendant

**Case No. 1:18-cv-00444-RP**

**EVAN P. JOWERS,**

Counterclaimant

v.

**MWK RECRUITING, INC.,**

Counterdefendant

**EVAN P. JOWERS,**

Third-Party Plaintiff

v.

**ROBERT E. KINNEY,  
MICHELLE W. KINNEY,  
RECRUITING PARTNERS**

**GP, INC., KINNEY  
RECRUITING LLC,  
COUNSEL UNLIMITED LLC,  
KINNEY RECRUITING  
LIMITED,**

Third-Party Defendants

**UNOPPOSED MOTION TO EXTEND TIME FOR MWK TO ANSWER OR  
OTHERWISE RESPOND TO DEFENDANT'S COUNTERCLAIMS**

Plaintiff MWK Recruiting, Inc. ("MWK") hereby moves the Court to extend the time within which Plaintiff is required to respond to Defendant Evan P. Jowers's ("Jowers") answer, affirmative defenses, counterclaims, and third-party complaint to defendant Evan P. Jowers to MWK Recruiting, Inc.'s second amended complaint (Dkt. No. 90) ("Answer and Counterclaim").

On August 19, 2019, Defendant filed its Answer and Counterclaim.

On August 21, 2019, this Court granted the third-parties an extension up to and including September 27, 2019 to answer or otherwise respond to the Answer and Counterclaim.

MWK's current deadline to answer or otherwise respond to the Answer and Counterclaim is September 9, 2019.

MWK requests an extension of time of 18 days to answer or otherwise respond to Defendant's Answer and Counterclaim.

This request is not for delay but so that justice may be served.

WHEREFORE, Plaintiff MWK moves the Court to extend its deadline to answer or otherwise respond to Defendant's Answer and Counterclaim up to and including September 27, 2019.

Counsel for MWK has conferred with counsel for Jowers, and counsel for Jowers stated Jowers was unopposed to this motion.

Dated: September 3, 2019

Respectfully Submitted

/s/ Robert E. Kinney

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